

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: Michael Cory Bailey, Debtor

**Case No. 25-10991-SDM
CHAPTER 13**

RESPONSE

COMES NOW, Debtor, by and through counsel, and responds to Trustee's Motion to Dismiss (dk # 16) as follows:

1. Debtor commenced this case on March 27, 2025 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. The Debtor's wage order was entered and forwarded to the Debtor's employer as required; however, the employer failed to timely implement the wage garnishment.
3. The employer has recently begun deducting the plan payments as required, and the Debtor anticipates that the plan payments will now continue on a regular schedule pursuant to the wage order.
4. Debtor can continue making the plan payments.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on July 1, 2025, to:

By Electronic CM/ECF Notice:

Todd S. Johns

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.